



November 14, 2007

Reply to Attn of: 140

TO: Distribution

FROM: 140/Chief Counsel

SUBJECT: Determination Regarding Attendance of NASA Employees at Reception at the Embassy of the Russian Federation on November 16, 2007.

On the evening of November 16, 2007, a reception is being held at the Embassy of the Russian Federation for the purpose of celebrating "50 years of the Space Age." The event is being sponsored by Roscosmos, the American Association for the Advancement of Science, the American Astronautical Society, the American Institute of Aeronautics and Astronautics, the Eisenhower Institute, the National Institute of Aerospace, and the Embassy of the Russian Federation. Approximately 100 guests are expected to attend the reception, including individuals from the aerospace industry, other Federal agencies, and educational institutions. The estimated cost per person of the reception is approximately \$50. Attendance at the reception will allow NASA employees an opportunity to discuss with other guests issues concerning the space program, a core function of NASA's mission.

Based on the above, I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR 2635.204(g). I further find that there is an Agency interest in having NASA employees attend this event. Accordingly, NASA employees whose duties do not substantially affect any of the sponsors may accept an invitation for free attendance to the reception for themselves and their spouses or guests.

NASA employees whose duties substantially affect any of the sponsors, for instance by way of procurement duties, should seek an individual determination regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Robert M. Stephens".

Robert M. Stephens